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October 2, 2012

The Honorable Magistrate Judge William D. Wall
100 Federal Plaza
P.O. Box 9014
Courtroom 820
Central Islip, NY 11722-9014

Re: *Jamal M. Safa v. Deutsche Lufthansa Aktiengesellschaft, Inc.*
Case No. 12-cv-2950 (ADS) (WDW)
Joint Letter Application Regarding Proposed Scheduling Order

Dear Judge Wall:

Pursuant to your September 10, 2012, Initial Conference Order [DE 22], counsel for the parties have met and conferred regarding the Court's proposed scheduling order. Counsel agree as to some of the Court's proposed dates, ask that the dispositive motion deadline be extended, and would also like to propose additional agreed dates, as stated below:

- **March 25, 2013:** No additional parties may be joined, and no pleading may be amended without good cause shown.
- **February 28, 2013:** Deadline to complete Plaintiff's deposition.
- **March 29, 2013:** All fact discovery, including fact depositions, shall be completed.
- **April 12, 2013:** Plaintiff shall provide expert disclosures/reports pursuant to Rule 26.
- **May 10, 2013:** Defendant shall provide expert disclosures/reports pursuant to Rule 26.
- **May 24, 2013:** Rebuttal Reports shall be provided.

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- **June 17, 2013:** All expert discovery, including expert depositions, shall be completed.
- **July 26, 2013:** Any party planning to make a dispositive motion must take the first action beginning the motion process by this date or risk forfeiting the right to make such a motion.
- **July 17, 2013:** Joint Pretrial Order shall be submitted to the Court.

Because the parties are in agreement regarding the above-proposed dates, they respectfully request that the initial conference scheduled for October 9, 2012, at 2:00 p.m., be canceled, and that the Court enter a Scheduling Order reflecting the above dates.

Sincerely,



Ricardo M. Martínez-Cid
Counsel for Plaintiff



Thomas Mealiffe
Counsel for Defendant

RMC/llb